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Attorneys for Defendants  
OAKLAND UNIFIED SCHOOL DISTRICT,  
VANESSA SIFUENTES, and JAROD SCOTT

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA**

CLEVELAND McKINNEY,

Plaintiff,

vs.

OAKLAND UNIFIED SCHOOL DISTRICT,  
VANESSA SIFUENTES, and JAROD  
SCOTT, and DOES 1-10 inclusive,

Defendants.

Case No.: 3:20-cv-06792-JSC

**STIPULATION AND [PROPOSED]  
ORDER TO ALLOW EXPERT  
DEPOSITION ONE DAY PAST  
CUTOFF**

LR 6.2

**Hon. Jacqueline Scott Corley**

Plaintiff CLEVELAND MCKINNEY and defendants OAKLAND UNIFIED  
SCHOOL DISTRICT, VANESSA SIFUENTES, and JAROD SCOTT, jointly file this  
stipulation to request that Defendants take Plaintiff's expert witness' deposition one day  
past the expert discovery cutoff.

The trial and all other dates will not be disturbed.

The expert discovery deadline in this case is April 28, 2022. The parties seek to  
conduct Defendants' deposition of Plaintiff's economic damages expert on April 29,

2022, one day past the cutoff. There is good cause for this request because Plaintiff's counsel and expert were not available on the dates noticed for deposition. The soonest they were available is April 29, 2022.

There has been one previous request, which was granted, to extend discovery, with no change to the trial date.

Dated: April 25, 2022                      SIEGEL, YEE, BRUNNER & MEHTA

By: /s/ Sonya Z. Mehta

Sonya Z. Mehta  
Attorneys for Plaintiff  
CLEVELAND McKINNEY

Dated: April 25, 2022                      BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: /s/ Ethan Lowry

Eugene B. Elliot  
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Benjamin I. Oreper  
Attorneys for Defendants  
OAKLAND UNIFIED SCHOOL DISTRICT,  
VANESSA SIFUENTES, and JAROD SCOTT

#### ATTORNEY ATTESTATION

I hereby attest that I have been authorized by counsel to show their signature on this Stipulation as /s/.

Dated: April 25, 2022

By: /s/ Ethan Lowry  
Ethan M. Lowry

1 **[PROPOSED] ORDER**

2 The Court, having considered the papers on file herein, and good cause appearing  
3 therefore, HEREBY ORDERS as follows:

4 Defendant may depose Plaintiff's economic damages expert on April 29, 2022,  
5 one day past the expert discovery cutoff.

6 The trial date will remain the same.

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8 **IT IS SO ORDERED.**

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10 DATED: \_\_\_\_\_

11 \_\_\_\_\_  
12 Jacqueline Scott Corley  
13 UNITED STATES DISTRICT JUDGE  
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